

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
MIDLAND/ODESSA DIVISION**

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| <p>CONTIQUE WILLCOT,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>SECURITIES &amp; EXCHANGE COMMISSION,<br/>GTS SECURITIES LLC, ARI RUBINSTEIN,<br/>NEXT BRIDGE HYDROCARBONS, INC.,<br/>JOHN BRDA, GREGORY MCCABE, and<br/>FINANCIAL INDUSTRY REGULATORY<br/>AUTHORITY,</p> <p style="text-align: center;">Defendants.</p> | <p style="text-align: center;">Case No.</p> <p style="text-align: center;">7:24-CV-317-RCG-DC</p> |
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**DEFENDANT FINANCIAL INDUSTRY REGULATORY AUTHORITY, INC.’S  
UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE  
REPLY BRIEF IN SUPPORT OF FINRA’S MOTION TO DISMISS  
PLAINTIFF’S SECOND AMENDED COMPLAINT**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure (“FRCP”), Defendant Financial Industry Regulatory Authority, Inc. (“FINRA”) files this UNOPPOSED Motion for Extension of Time until August 22, 2025 to file a Reply Brief in Support of FINRA’s Motion to Dismiss Plaintiff’s Second Amended Complaint (“Motion for Extension”).

1. Plaintiff filed his Second Amended Complaint on June 12, 2025 [ECF 73].
2. FINRA filed its Motion to Dismiss the Second Amended Complaint on July 14, 2025 [ECF 94-1].
3. Plaintiff filed his Response in Opposition on July 17 [ECF 98].
4. Absent an extension of time, FINRA’s Reply Brief in Support of its Motion to Dismiss would be due on July 24. FINRA requests additional time until August 22, 2025 to file its Reply Brief. Plaintiff’s Response in Opposition raises numerous issues that FINRA needs to

address, including many mischaracterizations, as well as a request for leave to file a third amended complaint, permission to conduct jurisdictional discovery and lifting of the PSLRA discovery stay [ ECF 98, pp. 4, 5, 6, 8, 15, 18]. FINRA's client representatives are out of the office and unavailable to consult with counsel in time to file a response this week, so FINRA requires additional time to prepare its Reply Brief.

5. Extending the deadline for FINRA to file its Opposition would not upset or require change to any pending deadlines.

6. Plaintiff does not object to this extension of time.

**WHEREFORE**, FINRA respectfully moves for an extension of time to and including August 22, 2025, to file its Reply Brief in Support of its Motion to Dismiss Plaintiff's Second Amended Complaint.

Respectfully submitted,



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**LOCAL RULE CV-7(G) CERTIFICATE OF CONFERENCE**

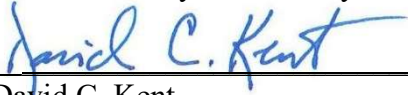
On July 21, 2025, counsel for FINRA conferred with Plaintiff who stated he has NO OPPOSITION to any of the relief requested in this Motion.



David C. Kent

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing was served on all *pro se* parties and counsel of record through the CM/ECF system on July 21, 2025.

  
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David C. Kent